

APR 05 2000

Facsimile and Mail

Ms. Gwen Zervas
Bureau of Federal Case Management
Department of Environmental Protection
401 East State Street
P. O. Box 028
Trenton, New Jersey 08625

Re: MW-19/Hot Spot 1 Area Remedial Investigation Report, L.E.
Carpenter Site, Wharton Borough, Morris County, N.J.

Dear Ms. Zervas:

The U. S. Environmental Protection Agency (EPA) has reviewed the MW-19/Hot Spot 1 Area Remedial Investigation Report, dated March 2000, for the L.E. Carpenter Site, Wharton Borough, Morris County, N.J., and offers the following comments.

EPA does not concur with the conclusion on page 10 of the report, that the investigation established a shallow groundwater clean zone, or that no further investigations are needed. The data clearly does not support this conclusion in the north part of the study area, where MW-19-6 significantly exceeds the Ground Water Quality Criteria with respect to Benzene, Toluene, and slightly for DEHP, and where no monitoring wells are directly down gradient. The clean HP-1 and relatively clean MW-19-8 sample locations, which the report seems to infer are down gradient, could very well be side gradient, or fringe to the very hot MW-19-5, and hot MW-19-6, locations. Given that well screen for MW-19-6 is approximately 4 feet below the bottom of MW-19-5 screen, raises the concern that there is a deeper component of the plume that may be going undetected. Therefore, even though we had previously discussed the possible need for installing one additional monitoring well between HP-1 and MW-19-8, a cluster would be more appropriate, so as to ensure the leading edge of the plume is not traveling beneath the depth existing wells are screened at. EPA recommends the use of 10 foot well screens, with the shallow well screen extend from the water table for 10 feet, the second would extend from the bottom of the previous for an additional 10 feet.

In addition, as we previously discussed, we look forward to reviewing the Potentially Responsible Parties schedule for the upcoming remedial design and remedial action phase of work for the MW-19 Hot Spot area, as soon as it has been developed.

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Thank you for the opportunity to provide comments on the above report. Please feel free to contact me to discuss this matter further at (212) 637-4411.

Yours truly,

Stephen Cipot, Project Manager
Southern New Jersey Remediation Section

cc: Andy Crossland, PSB
Kim O'Connell, SNJRS

bcc: Stephen Cipot, SNJRS